

EXHIBIT D

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(Admission pending *pro hac vice* application)
Attorneys for Plaintiff Lynne Freeman

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

----- x

LYNNE FREEMAN, an individual,

Case No. 1:22-cv-02435-LLS

Plaintiff,
-against-

TRACY DEEBS-ELKENANEY P/K/A TRACY WOLFF,
an individual, EMILY SYLVAN KIM, an individual,
PROSPECT AGENCY, LLC, a New Jersey limited
liability company, ENTANGLED PUBLISHING, LLC, a
Delaware limited liability company, HOLTZBRINCK
PUBLISHERS, LLC, D/B/A MACMILLAN, a New
York limited liability company, UNIVERSAL CITY
STUDIOS, LLC, a Delaware limited liability company,
CRAZY MAPLE STUDIO, INC, a California corporation

Defendants.

----- x
**PLAINTIFF LYNNE
FREEMAN'S SECOND
REQUEST FOR
PRODUCTION OF
DOCUMENTS TO
DEFENDANTS PROSPECT
AGENCY, LLC, EMILY
SYLVAN KIM,
ENTANGLED
PUBLISHING, LLC,
TRACY DEEBS-
ELKENANEY P/K/A
TRACY WOLFF AND
HOLTZBRINCK
PUBLISHERS, LLC D/B/A
MACMILLAN, AND
UNIVERSAL CITY
STUDIOS, LLC, SET TWO**

Propounding Party: Plaintiff Lynne Freeman

Assigned to the Hon. Louis L
Stanton

Responding Parties: Defendants Prospect Agency, LLC,
Emily Sylvan Kim, Entangled Publishing, LLC, Tracy
Deebs-Elkananey p/k/a Tracy Wolff and Holtzbrink
Publishers, LLC d/b/a Macmillan and Universal City
Studios, Inc.

FAC FILED: May 23, 2022

Set: Two

Pursuant to Federal Rule of Civil Procedure Rule 34, Defendants Prospect Agency, LLC

Emily Sylvan Kim, Entangled Publishing, LLC, Tracy Deebs-Elkenaney p/k/a Tracy Wolff, Holtzbrink Publishers, LLC d/b/a Macmillan and Universal City Studios, Inc., are hereby requested to serve within thirty (30) days a written response under oath to the following requests and to produce those documents identified in response to Plaintiff Lynne Freeman's ("Freeman" or "Plaintiff") requests for production of documents to Paul LiCalsi, Esq. at the law firm of Reitler Kailas & Rosenblatt LLC, 885 Third Avenue, 20th Floor, New York, New York 10022.

Your written responses shall state with respect to each item or category, that inspection-related activities will be permitted as requested, unless request is refused, in which event the reasons for refusal shall be stated. If the refusal relates to part of an item or category, that part shall be specified. If any refusal is made on the basis of attorney client privilege, you shall supply the information required by Local Rule 26.2. To the extent that any request calls for the production of electronically stored information, Plaintiff requests that all documents be produced in native format with all Metadata, including, without limitation, document level text, file and custodian names and document dates, sent and received dates, sender and recipient information, and an accompanying load file (in .dat, .opt, or lfp format).

DEFINITIONS

As used in these requests, the following terms are to be interpreted in accordance with these definitions:

- A. "FREEMAN" shall mean plaintiff Lynne Freeman.
- B. "KIM" shall mean defendant Emily Sylvan Kim.

C. "PROSPECT" shall mean defendant Prospect Agency, LLC. and, where applicable, its officers, directors, employees, partners, corporate parent, subsidiaries or affiliates

D. "WOLFF" shall mean defendant Tracy Deeks-Elkenaney p/k/a Tracy Wolff.

E. "ENTANGLED" shall mean defendant Entangled Publishing, LLC and, where applicable, its officers, directors, employees, partners, corporate parent, subsidiaries or affiliates.

F. "MACMILLAN" shall mean defendant Holtzbrinck Publishers, LLC, d/b/a Macmillan and, where applicable, its officers, directors, employees, partners, corporate parent, subsidiaries or affiliates.

G. "UNIVERSAL" shall mean defendant Universal City Studios, LLC. and, where applicable, its officers, directors, employees, partners, corporate parent, subsidiaries or affiliates.

H. "YOU" shall mean collectively PROSPECT, KIM, ENTANGLED, WOLFF, MACMILLAN and UNIVERSAL.

I. "CRAZY MAPLE STUDIO" shall mean defendant Crazy Maple Studio, Inc. and, where applicable, its officers, directors, employees, partners, corporate parent, subsidiaries or affiliates.

J. "PELLETIER" shall mean Liz Pelletier of ENTANGLED as well as any attorney, manager, agent or other person or entity acting on behalf of Liz Pelletier.

K. "DOCUMENTS" shall have the meaning set forth in Local Rule 26.3(c) for the word "document."

L. "COMMUNICATIONS" shall have the meaning set forth in Local Rules 26.3(c) of the Local Rules for the word "communication."

M. "CRAVE BOOK SERIES" shall mean the books entitled Crave, Crush, Covet, Court, Charm and Cherish.

- N. "PERSON" shall have the meaning set forth in Local Rule 26.3(c).
- O. "CONCERNING" shall have the meaning set forth in Local Rule 26.3(c).
- P. "FAC" shall mean the First Amended Complaint filed in this action on May 23, 2022.
- Q. "BMR" shall mean any and all versions of the manuscript that FREEMAN alleges in the FAC she wrote, including, but not limited to, the versions entitled *Blue Moon Rising* and *Masqued*, and she alleges was infringed by the books in the CRAVE SERIES entitled *Crave*, *Crush*, *Covet* and *Court*.
- R. "COWAN FIRM DEFENDANTS' ANSWER" shall mean the Answer and Affirmative Defenses of the of Tracy Deebs-Elkananey p/k/a Tracy Wolff, Entangled Publishing, LLC, Holtzbrink Publishers, LLC, d/b/a Macmillan and Universal City Studios, LLC dated June 27, 2022 filed in this action.
- S. "KLARIS FIRM DEFENDANTS' ANSWER" shall mean the Answer of Prospect Agency, LLC and Emily Sylvan Kim to First Amended Complaint dated June 27, 2022 filed in this action.

INSTRUCTIONS

1. In responding to each Request set forth below, quote each Request for Production before each Response to that Request for Production.
2. In responding to each Request for Production set forth below, the DOCUMENT produced must indicate the Request for Production number to which it is responsive.

3. With respect to any DOCUMENT responsive to these requests for Production that YOU contend YOU are not required to produce because of an alleged privilege, please provide the information required by Local Rule 26.2.

DOCUMENT REQUESTS

1. All manuscripts, or excerpts from any manuscripts of any books written in whole or in part by WOLFF, other than any manuscripts for any books from the CRAVE BOOK SERIES, or excerpts from any manuscripts for any books from the CRAVE BOOK SERIES, for which there was a hit when defendants counsel had someone run the search terms provided to defendants by FREEMAN'S counsel in connection with plaintiff Lynne Freeman's Second Amended Request for Production of documents to Defendants Prospect Agency, LLC, Emily Sylvan Kim, Entangled Publishing, LLC, Tracy Deebs-Elkenaney p/k/a Tracy Wolff and Holtzrbrinck Publishers, LLC d/b/a Macmillan, Set One dated June 13, 2022.

2. All DOCUMENTS sufficient to identify WOLFF, PELLETIER KIM and/or Stacy Abrams decision making process in relation to the conception and drafting of any version of the manuscripts of any books in the CRAVE BOOK SERIES, including without limitation, with regard to the plot, characters, character names, settings, subject, themes, and story.

3. All DOCUMENTS and COMMUNICATIONS that mention, discuss, describe, refer to or relate to the conceptualization, development, and writing of the manuscripts, and all

versions of the manuscripts, in the CRAVE BOOK SERIES, including, but not limited to, all research, source material, and drafts, whether rejected and/or incorporated.

4. The number of sales of books broken down by format (e.g, hardcover, paperback, electronic etc.) of each and every book written in whole or in part by WOLFF prior to her writing the CRAVE BOOK SERIES.

5. The version of the manuscript for the book entitled *Crave* that existed immediately prior to the 50,000 word edit that WOLFF mentioned in the interview that she gave to Hank Garner about the book *Crave*.

6. The version of the manuscript for the book entitled *Crave* that existed immediately after the 50,000 word edit that WOLF mentioned in the interview that she gave to Hank Garner about the book *Crave*.

7. All DOCUMENTS relating to the payment or crediting of any money to anyone in connection with the exploitation of any of the books in the CRAVE BOOK SERIES that has not previously been produced by any of the defendants.

8. All DOCUMENTS in Google Docs CONCERNING any of the books in the CRAVE BOOK SERIES.

9. The master file that tracks changes made to any of the books in the CRAVE BOOK SERIES on Google Docs.

10. All DOCUMENTS that show the changes that were made to any of the books in the CRAVE BOOK SERIES on Google Docs, including, but not limited to, who made the changes.

11. An access log for the Google Docs account on which changes were made to any of the books in the CRAVE BOOK SERIES.

12. All DOCUMENTS that support or negate each denial set forth in the COWAN FIRM DEFENDANTS' ANSWER.

13. All DOCUMENTS that support or negate the First Affirmative Defense alleged in the COWAN FIRM DEFENDANTS' ANSWER.

14. All DOCUMENTS that support or negate the Second Affirmative Defense alleged in the COWAN FIRM DEFENDANTS' ANSWER

15. All DOCUMENTS that support or negate the Third Affirmative Defense alleged in the COWAN FIRM DEFENDANTS' ANSWER.

16. All DOCUMENTS that support or negate the Fourth Affirmative Defense alleged in the COWAN FIRM DEFENDANTS' ANSWER.

17. All DOCUMENTS that support or negate the Fifth Affirmative Defense alleged in the COWAN FIRM DEFENDANTS' ANSWER.

18. All DOCUMENTS that support or negate the Sixth Affirmative Defense alleged in the COWAN FIRM DEFENDANTS' ANSWER.

19. All DOCUMENTS that support or negate the Seventh Affirmative Defense alleged in the COWAN FIRM DEFENDANTS' ANSWER.

20. All DOCUMENTS that support or negate the Eighth Affirmative Defense alleged in the COWAN FIRM DEFENDANTS' ANSWER.

21. All DOCUMENTS that support or negate the Ninth Affirmative Defense alleged in the COWAN FIRM DEFENDANTS' ANSWER.

22. All DOCUMENTS that support or negate the Tenth Affirmative Defense alleged in the COWAN FIRM DEFENDANTS' ANSWER.

23. All DOCUMENTS that support or negate the Eleventh Affirmative Defense alleged in the COWAN FIRM DEFENDANTS' ANSWER.

24. All DOCUMENTS that support or negate the Twelfth Affirmative Defense alleged in the COWAN FIRM DEFENDANTS' ANSWER.

25. All DOCUMENTS that support or negate the Thirteenth Affirmative Defense alleged in the COWAN FIRM DEFENDANTS' ANSWER.

26. All DOCUMENTS that support or negate the Fourteenth Affirmative Defense alleged in the COWAN FIRM DEFENDANTS' ANSWER.

27. All DOCUMENTS that support or negate the Fifteenth Affirmative Defense alleged in the COWAN FIRM DEFENDANTS' ANSWER.

28. All DOCUMENTS that support or negate the Sixteenth Affirmative Defense alleged in the COWAN FIRM DEFENDANTS' ANSWER.

29. All DOCUMENTS that support or negate the Seventeenth Affirmative Defense alleged in the COWAN FIRM DEFENDANTS' ANSWER.

30. All DOCUMENTS that support or negate the Eighteenth Affirmative Defense alleged in the COWAN FIRM DEFENDANTS' ANSWER.

31. All DOCUMENTS that support or negate the Nineteenth Affirmative Defense alleged in the COWAN FIRM DEFENDANTS' ANSWER.

32. All DOCUMENTS that support or negate the Twentieth Affirmative Defense alleged in the COWAN FIRM DEFENDANTS' ANSWER.

33. All DOCUMENTS that support or negate the Twenty-First Affirmative Defense alleged in the COWAN FIRM DEFENDANTS' ANSWER.

34. All DOCUMENTS that support or negate the Twenty-Second Affirmative Defense alleged in the COWAN FIRM DEFENDANTS' ANSWER.

35. All DOCUMENTS that support or negate the Sixth Affirmative Defense alleged in the COWAN FIRM DEFENDANTS ANSWER.

36. All DOCUMENTS that support or negate the Twenty-Third Affirmative Defense alleged in the COWAN FIRM DEFENDANTS' ANSWER.

37. All DOCUMENTS that support or negate the Twenty-Fourth Affirmative Defense alleged in the COWAN FIRM DEFENDANTS' ANSWER.

38. All DOCUMENTS that support or negate the Twenty-Fifth Affirmative Defense alleged in the COWAN FIRM DEFENDANTS' ANSWER.

39. All DOCUMENTS that support or negate each denial set forth in the KLARIS FIRM DEFENDANTS' ANSWER.

40. All DOCUMENTS that support or negate the First Affirmative Defense alleged in the KLARIS FIRM DEFENDANTS' ANSWER.

41. All DOCUMENTS that support or negate the Second Affirmative Defense alleged in the KLARIS FIRM DEFENDANTS' ANSWER

42. All DOCUMENTS that support or negate the Third Affirmative Defense alleged in the KLARIS FIRM DEFENDANTS' ANSWER.

43. All DOCUMENTS that support or negate the Fourth Affirmative Defense alleged in the KLARIS FIRM DEFENDANTS ANSWER.

44. All DOCUMENTS that support or negate the Fifth Affirmative Defense alleged in the KLARIS FIRM DEFENDANTS' ANSWER.

45. All DOCUMENTS that support or negate the Sixth Affirmative Defense alleged in the KLARIS FIRM DEFENDANTS' ANSWER.

46. All DOCUMENTS that support or negate the Seventh Affirmative Defense alleged in the KLARIS FIRM DEFENDANTS' ANSWER.

47. All DOCUMENTS that support or negate the Eighth Affirmative Defense alleged in the KLARIS FIRM DEFENDANTS' ANSWER.

48. All DOCUMENTS that support or negate the Ninth Affirmative Defense alleged in the KLARIS FIRM DEFENDANTS' ANSWER.

49. All DOCUMENTS that support or negate the Tenth Affirmative Defense alleged in the KLARIS FIRM DEFENDANTS' ANSWER.

50. All DOCUMENTS that support or negate the Eleventh Affirmative Defense alleged in the KLARIS FIRM DEFENDANTS' ANSWER.

51. All DOCUMENTS that support or negate the Twelfth Affirmative Defense alleged in the KLARIS FIRM DEFENDANTS' ANSWER.

52. All DOCUMENTS that support or negate the Thirteenth Affirmative Defense alleged in the KLARIS FIRM DEFENDANTS' ANSWER.

53. All DOCUMENTS that support or negate the Fourteenth Affirmative Defense alleged in the KLARIS FIRM DEFENDANTS' ANSWER.

54. All DOCUMENTS that support or negate the Fifteenth Affirmative Defense alleged in the KLARIS FIRM DEFENDANTS' ANSWER.

55. All DOCUMENTS that support or negate the Sixteenth Affirmative Defense alleged in the KLARIS FIRM ' ANSWER.

56. All DOCUMENTS that support or negate the Seventeenth Affirmative Defense alleged in the KLARIS FIRM DEFENDANTS' ANSWER.

57. All DOCUMENTS that support or negate the Eighteenth Affirmative Defense alleged in the KLARIS FIRM DEFENDANTS' ANSWER.

58. All DOCUMENTS that support or negate the Nineteenth Affirmative Defense alleged in the KLARIS FIRM DEFENDANTS' ANSWER.

59. All DOCUMENTS that support or negate the Twentieth Affirmative Defense alleged in the KLARIS FIRM DEFENDANTS' ANSWER.

60. The native files with all metadata for the following documents previously produced in a non-native format: WOLFF_0012002, WOLFF_0011991, WOLFF_0011976 and WOLFF_0011975.

61. The revision history in Google Docs of all edits to any of the books in the CRAVE BOOK SERIES.

62. The notes about Alaska referred to in document number ENTANGLED_0074207.

63. The 1200-word version of the book entitled *Crush* referred to in document number ENTANGLED_0074584.

64. The *Crush* manuscript with the word “hallelujah” in it referred to in Document number WOLFF_0095768 in a text stream between WOLFF and KIM.

65. A copy of the 2014 BMR manuscript referred to in document number KIM 00163954.

66. The manuscript containing the scene from “Twilight” that was edited out referred to in document number WOLF_0097839.

Dated: November 23, 2022

Reitler Kailas & Rosenblatt LLC
Attorneys for Plaintiff

By: 

Mark D. Passin
11766 Wilshire Blvd., Suite 1470
Los Angeles, CA 90025
Telephone: (310) 861-2470
Email: mark@csrlawyers.com

Paul LiCalsi
885 Third Avenue, 20th Floor
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PROOF OF SERVICE

STATE OF CALIFORNIA)
COUNTY OF LOS ANGELES) ss:

I am employed in the County of Los Angeles, State of California. I am over the age of 18 and not a party to the within action; my business address is: 11766 Wilshire Blvd., Suite 1470, Los Angeles, CA 90025.

On November 23, 2022 I served the foregoing document described as **PLAINTIFF LYNNE FREEMAN'S AMENDED REQUEST FOR PRODUCTION OF DOCUMENTS TO DEFENDANTS PROSPECT AGENCY, LLC, EMILY SYLVAN KIM, ENTANGLED PUBLISHING, LLC, TRACY DEEBS-ELKENANEY P/K/A TRACY WOLFF AND HOLTZBRINCK PUBLISHERS, LLC D/B/A MACMILLAN AND UNIVERSAL CITY STUDIOS, LLC SET TWO** on the parties in this action listed below as follows:

<p>Nancy Wolff <u>nwolff@cdas.com</u> CeCe Cole <u>ccole@cdas.com</u> Cowan, DeBaets, Abrahams & Sheppard LLP Dwayne Goetzel <u>dgoetzel@intprop.com</u> Kowert, Hood, Munyon, Rankin & Goetzel</p>	<p><i>Attorneys for Defendants,</i> TRACY DEEBS-ELKENANEY P/K/A TRACY WOLFF, ENTANGLED PUBLISHING, LLC, HOLTZBRINCK PUBLISHERS, LLC, D/B/A/ MACMILLAN, UNIVERSAL CITY STUDIOS, LLC</p>
<p>Lacy Herman Koonce, III <u>lance.koonce@klarislaw.com</u> Zachary M. Press <u>zpress@mkslex.com</u> Klaris Law</p>	<p><i>Attorneys for Defendants,</i> EMILY SYLVAN KIM, PROSPECT AGENCY, LLC</p>

BY MAIL: By placing a true and correct copy of the above-described document(s) in envelope(s), addressed as set forth above, with first class postage pre-paid for delivery to the above-named persons at the above-listed addresses and depositing such envelopes in a US mail collection box.

BY OVER NIGHT DELIVERY, VIA FED-EX: I gave the document(s) to our overnight courier service for delivery to the offices of the addressee, addressed as set forth above.

BY PERSONAL SERVICE, VIA FIRST LEGAL ATTORNEY SERVICE: I gave said documents to the firm's regular attorney service with specific instructions to be personally delivered by hand to the offices of the addressee, addressed as set forth above.

BY PERSONAL SERVICE (*Ex Parte*): I personally delivered by hand to the attorney in attendance on behalf of the above-named counsel at the hearing of _____, in Department _____ of the _____ Courthouse, _____, California.

BY ELECTRONIC MAIL: I transmitted said document(s) to the person(s) shown above by electronic mail to the email address shown above.

BY FACSIMILE: I faxed said document(s) to the addressee, at the specified fax numbers shown above.

COURTESY COPY BY ELECTRONIC MAIL: I transmitted courtesy copies of said document(s) to the person(s) shown above by electronic mail to the email address shown above.

(State) I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

(Federal) I declare that I am employed in the office of a member of the bar of this court at whose direction the service was made.

Executed on November 23, 2022, at Los Angeles, California.



Mark D. Passin

Reitler Kailas & Rosenblatt LLC
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New York, New York 10022
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Facsimile: (310) 861-2476
Email: mark@csrlawyers.com
(Admission pending *pro hac vice* application)
Attorneys for Plaintiff Lynne Freeman

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

----- x

LYNNE FREEMAN, an individual,

Case No. 1:22-cv-02435-LIS

Plaintiff,

-against-

TRACY DEEBS-ELKENANEY P/K/A TRACY WOLFF,
an individual, EMILY SYLVAN KIM, an individual,
PROSPECT AGENCY, LLC, a New Jersey limited
liability company, ENTANGLED PUBLISHING, LLC, a
Delaware limited liability company, HOLTZBRINCK
PUBLISHERS, LLC, D/B/A MACMILLAN, a New
York limited liability company, UNIVERSAL CITY
STUDIOS, LLC, a Delaware limited liability company,
CRAZY MAPLE STUDIO, INC, a California corporation

Defendants.

----- x

Propounding Party: Lynne Freeman

Responding Party: Prospect Agency, LLC

Set: Three

**PLAINTIFF LYNNE
FREEMAN'S
INTERROGATORIES TO
DEFENDANT PROSPECT
AGENCY, LLC SET
THREE**

FAC FILED: May 23, 2022

Pursuant to Federal Rule of Civil Procedure Rule 33, Plaintiff Lynne Freeman (“Freeman” or “Plaintiff”) requests that Defendant Prospect Agency, LLC, answer the following interrogatories under oath and serve them upon Plaintiff within 30 days.

DEFINITIONS

As used in these requests, the following terms are to be interpreted in accordance with these definitions:

- a. “YOU” and “YOUR” shall mean defendant Prospect Agency, LLC.
- b. “ACTION” shall mean this action filed in the United States District Court for the Southern District of New York (Case No. 1:22-cv-02435-AT) entitled Lynne Freeman v. Tracy Deeb-Elkenaney p/k/a Tracy Wolff et. al.
- c. “CRAVE BOOK SERIES” shall mean the books entitled Crave, Crush, Covet, Court, Charm and Cherish.
- d. “BMR” shall mean any and all versions of the manuscript that FREEMAN alleges in the First Amended Complaint that she wrote, including, but not limited to, the versions entitled *Blue Moon Rising* and *Masqued*, and she alleges was infringed by the books in the CRAVE SERIES entitled *Crave, Crush, Covet and Court*.
- e. “KLARIS FIRM DEFENDANTS’ ANSWER” shall mean the Answer of Prospect Agency, LLC and Emily Sylvan Kim to First Amended Complaint dated June 27, 2022 filed in this action.

INTERROGATORIES

INTERROGATORY NO. 8:

Identify by name, company, address or e-mail address, as applicable, and date sent, all individuals or entities to whom YOU or anyone on your behalf sent a copy of any version of BMR.

INTERROGATORY NO. 9:

Describe in detail each and every fact that supports or negates each denial of the allegations in Lynne Freeman's First Amended Complaint filed in this ACTION set forth in the KLARIS FIRM DEFENDANTS' ANSWER.

INTERROGATORY NO. 10:

Describe in detail each and every fact that supports or negates the First Affirmative Defense alleged in the KLARIS FIRM DEFENDANTS' ANSWER.

INTERROGATORY NO. 11:

Describe in detail each and every fact that supports or negates the Second Affirmative Defense alleged in the KLARIS FIRM DEFENDANTS' ANSWER.

INTERROGATORY NO. 12:

Describe in detail each and every fact that supports or negates the Sixth Affirmative Defense alleged in the KLARIS FIRM DEFENDANTS' ANSWER.

INTERROGATORY NO. 13:

Describe in detail each and every fact that supports or negates the Eighth Affirmative Defense alleged in the KLARIS FIRM DEFENDANTS' ANSWER.

INTERROGATORY NO. 14:

Describe in detail each and every fact that supports or negates the Tenth Affirmative Defense alleged in the KLARIS FIRM DEFENDANTS' ANSWER.

INTERROGATORY NO. 15:

Describe in detail each and every fact that supports or negates the Eleventh Affirmative Defense alleged in the KLARIS FIRM DEFENDANTS' ANSWER.

INTERROGATORY NO. 16:

Describe in detail each and every fact that supports or negates the Thirteenth Affirmative Defense alleged in the KLARIS FIRM DEFENDANTS' ANSWER.

INTERROGATORY NO. 17:

Describe in detail each and every fact that supports or negates the Fifteenth Affirmative Defense alleged in the KLARIS FIRM DEFENDANTS' ANSWER.

INTERROGATORY NO. 18:

Describe in detail each and every fact that supports or negates the Sixteenth Affirmative Defense alleged in the KLARIS FIRM DEFENDANTS' ANSWER.

INTERROGATORY NO. 19:

Describe in detail each and every fact that supports or negates the Seventeenth Affirmative Defense alleged in the KLARIS FIRM DEFENDANTS' ANSWER.

INTERROGATORY NO. 20:

Describe in detail each and every fact that supports or negates the Nineteenth Affirmative Defense alleged in the KLARIS FIRM DEFENDANTS' ANSWER.

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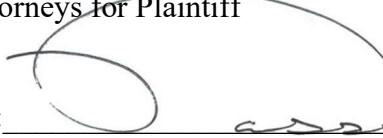
/ / /

/ / /

Dated: November 23, 2022

CSReeder, P.C.

Attorneys for Plaintiff

By: 

Mark D. Passin
11766 Wilshire Blvd., Suite 1470
Los Angeles, CA 90025
Telephone: (310) 861-2470
Email: mark@csrlawyers.com

Reitler Kailas & Rosenblatt LLC
Paul LiCalsi
885 Third Avenue, 20th Floor
New York, New York 10022
Main: 212-209-3050
Email: plicalsi@reiterlaw.com

PROOF OF SERVICE

STATE OF CALIFORNIA)
COUNTY OF LOS ANGELES) ss:

I am employed in the County of Los Angeles, State of California. I am over the age of 18 and not a party to the within action; my business address is: 11766 Wilshire Blvd., Suite 1470, Los Angeles, CA 90025.

On November 23, 2022 I served the foregoing document described as **PLAINTIFF LYNNE FREEMAN'S INTERROGATORIES TO DEFENDANT PROSPECT AGENCY, LLC, SET THREE** on the parties in this action listed below as follows:

<p>Nancy Wolff <u>nwolff@cdas.com</u> CeCe Cole <u>ccole@cdas.com</u> Cowan, DeBaets, Abrahams & Sheppard LLP</p> <p>Dwayne Goetzel <u>dgoetzel@intprop.com</u> Kowert, Hood, Munyon, Rankin & Goetzel</p>	<p><i>Attorneys for Defendants,</i> TRACY DEEBS-ELKENANEY P/K/A TRACY WOLFF, ENTANGLED PUBLISHING, LLC, HOLTZBRINCK PUBLISHERS, LLC, D/B/A/ MACMILLAN, UNIVERSAL CITY STUDIOS, LLC</p>
<p>Lacy Herman Koonce, III <u>lance.koonce@klarislaw.com</u> Zachary M. Press <u>zpress@mkslex.com</u> Klaris Law</p>	<p><i>Attorneys for Defendants,</i> EMILY SYLVAN KIM, PROSPECT AGENCY, LLC</p>
<p>_____ _____ j:</p>	

BY MAIL: By placing a true and correct copy of the above-described document(s) in envelope(s), addressed as set forth above, with first class postage pre-paid for delivery to the above-named persons at the above-listed addresses and depositing such envelopes in a US mail collection box.

BY OVER NIGHT DELIVERY, VIA FED-EX: I gave the document(s) to our overnight courier service for delivery to the offices of the addressee, addressed as set forth above.

BY PERSONAL SERVICE, VIA FIRST LEGAL ATTORNEY SERVICE: I gave said documents to the firm's regular attorney service with specific instructions to be personally delivered by hand to the offices of the addressee, addressed as set forth above.

BY PERSONAL SERVICE (*Ex Parte*): I personally delivered by hand to the attorney in attendance on behalf of the above-named counsel at the hearing of _____, in Department ___ of the _____ Courthouse, _____, California.

BY ELECTRONIC MAIL: I transmitted said document(s) to the person(s) shown above by electronic mail to the email address shown above.

BY FACSIMILE: I faxed said document(s) to the addressee, at the specified fax numbers shown above.

COURTESY COPY BY ELECTRONIC MAIL: I transmitted courtesy copies of said document(s) to the person(s) shown above by electronic mail to the email address shown above.

(State) I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

(Federal) I declare that I am employed in the office of a member of the bar of this court at whose direction the service was made.

Executed on November 23, 2022, at Los Angeles, California.



Mark D. Passin

Reitler Kailas & Rosenblatt LLC
885 Third Avenue, 20th Floor
New York, New York 10022
Main: 212-209-3050
Fax: 212-371-5500
Email: plicalsi@reiterlaw.com

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11766 Wilshire Blvd., Suite 1470
Los Angeles, CA 90025
Telephone: (310) 861-2470
Facsimile: (310) 861-2476
Email: mark@csrlawyers.com
(Admission pending *pro hac vice* application)
Attorneys for Plaintiff Lynne Freeman

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

----- x

LYNNE FREEMAN, an individual,

Case No. 1:22-cv-02435-LIS

Plaintiff,

-against-

TRACY DEEBS-ELKENANEY P/K/A TRACY WOLFF,
an individual, EMILY SYLVAN KIM, an individual,
PROSPECT AGENCY, LLC, a New Jersey limited
liability company, ENTANGLED PUBLISHING, LLC, a
Delaware limited liability company, HOLTZBRINCK
PUBLISHERS, LLC, D/B/A MACMILLAN, a New
York limited liability company, UNIVERSAL CITY
STUDIOS, LLC, a Delaware limited liability company,
CRAZY MAPLE STUDIO, INC, a California corporation

Defendants.

----- x

Propounding Party: Lynne Freeman

Responding Party: Entangled Publishing, LLC

Set: FOUR

**PLAINTIFF LYNNE
FREEMAN'S
INTERROGATORIES TO
DEFENDANT
ENTANGLED
PUBLISHING, LLC, SET
FOUR**

FAC FILED: May 23, 2022

Pursuant to Federal Rule of Civil Procedure Rule 33, Plaintiff Lynne Freeman (“Freeman” or “Plaintiff”) requests that Defendant Entangled Publishing, LLC, answer the following interrogatories under oath and serve them upon Plaintiff within 30 days.

DEFINITIONS

As used in these requests, the following terms are to be interpreted in accordance with these definitions:

- a. “YOU” and “YOUR” shall mean defendant Entangled Publishing, LLC.
- b. “ACTION” shall mean this action filed in the United States District Court for the Southern District of New York (Case No. 1:22-cv-02435-AT) entitled Lynne Freeman v. Tracy Deeks-Elkenaney p/k/a Tracy Wolff et. al.
- c. “CRAVE BOOK SERIES” shall mean the books entitled Crave, Crush, Covet, Court, Charm and Cherish.
- d. “BMR” shall mean any and all versions of the manuscript that FREEMAN alleges in the First Amended Complaint filed in the Action that she wrote, including, but not limited to, the versions entitled *Blue Moon Rising* and *Masqued*, and she alleges was infringed by the books in the CRAVE SERIES entitled *Crave, Crush, Covet* and *Court*.
- e. “COWAN FIRM DEFENDANTS’ ANSWER” shall mean the Answer and Affirmative Defenses of the of Tracy Deeks-Elkenaney p/k/a Tracy Wolff, Entangled Publishing, LLC, Holtzbrink Publishers, LLC, d/b/a Macmillan and Universal City Studios, LLC dated June 27, 2022 filed in this ACTION.

INTERROGATORIES

INTERROGATORY NO. 9:

Identify by name, company, address or e-mail address, as applicable, and date sent, all individuals or entities to whom YOU, or anyone on your behalf, sent a copy of any version of BMR.

INTERROGATORY NO. 10:

Describe in detail each and every fact that supports or negates the Thirteenth Affirmative Defense alleged in the COWAN FIRM DEFENDANTS' ANSWER.

INTERROGATORY NO. 11:

Describe in detail each and every fact that supports or negates each denial of the allegations in Lynne Freeman's First Amended Complaint filed in this ACTION set forth in the COWAN FIRM DEFENDANTS' ANSWER.

INTERROGATORY NO. 12:

Describe in detail each and every fact that supports or negates the Twenty-Fourth Affirmative Defense alleged in the COWAN FIRM DEFENDANTS' ANSWER.

INTERROGATORY NO. 13:

Describe in detail each and every fact that supports or negates the Second Affirmative Defense alleged in the COWAN FIRM DEFENDANTS' ANSWER.

INTERROGATORY NO. 14:

Describe in detail each and every fact that supports or negates the Third Affirmative Defense alleged in the COWAN FIRM DEFENDANTS' ANSWER.

INTERROGATORY NO. 15:

Describe in detail each and every fact that supports or negates the Fourth Affirmative Defense alleged in the COWAN FIRM DEFENDANTS' ANSWER.

INTERROGATORY NO. 16:

Describe in detail each and every fact that supports or negates the Fifth Affirmative Defense alleged in the COWAN FIRM DEFENDANTS' ANSWER.

INTERROGATORY NO. 17:

Describe in detail each and every fact that supports or negates the Seventh Affirmative Defense alleged in the COWAN FIRM DEFENDANTS' ANSWER.

INTERROGATORY NO. 18:

Describe in detail each and every fact that supports or negates the Eighth Affirmative Defense alleged in the COWAN FIRM DEFENDANTS' ANSWER.

INTERROGATORY NO. 19:

Describe in detail each and every fact that supports or negates the Tenth Affirmative Defense alleged in the COWAN FIRM DEFENDANTS' ANSWER.

INTERROGATORY NO. 20:

Describe in detail each and every fact that supports or negates the Seventeenth Affirmative Defense alleged in the COWAN FIRM DEFENDANTS' ANSWER.

INTERROGATORY NO. 21:

Describe in detail each and every fact that supports or negates the Twenty-Third Affirmative Defense alleged in the COWAN FIRM DEFENDANTS' ANSWER.

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Dated: November 23, 2022

CSReeder, P.C.
Attorneys for Plaintiff

By: 

Mark D. Passin
11766 Wilshire Blvd., Suite 1470
Los Angeles, CA 90025
Telephone: (310) 861-2470
Email: mark@csrlawyers.com

Reitler Kailas & Rosenblatt LLC
Paul LiCalsi
885 Third Avenue, 20th Floor
New York, New York 10022
Main: 212-209-3050
Email: plicalsi@reiterlaw.com

PROOF OF SERVICE

**STATE OF CALIFORNIA)
COUNTY OF LOS ANGELES) ss:**

I am employed in the County of Los Angeles, State of California. I am over the age of 18 and not a party to the within action; my business address is: 11766 Wilshire Blvd., Suite 1470, Los Angeles, CA 90025.

On November 23, 2022 I served the foregoing document described as **PLAINTIFF LYNNE FREEMAN'S INTERROGATORIES TO ENTANGLED PUBLISHING, LLC, SET FOUR** on the parties in this action listed below as follows:

Nancy Wolff nwolff@cdas.com CeCe Cole ccole@cdas.com Cowan, DeBaets, Abrahams & Sheppard LLP Dwayne Goetzel dgoetzel@intprop.com Kowert, Hood, Munyon, Rankin & Goetzel	<i>Attorneys for Defendants,</i> TRACY DEEBS-ELKENANEY P/K/A TRACY WOLFF, ENTANGLED PUBLISHING, LLC, HOLTZBRINCK PUBLISHERS, LLC, D/B/A/ MACMILLAN, UNIVERSAL CITY STUDIOS, LLC
Lacy Herman Koonce, III lance.koonce@klarislaw.com Zachary M. Press zpress@mkslex.com Klaris Law	<i>Attorneys for Defendants,</i> EMILY SYLVAN KIM, PROSPECT AGENCY, LLC

BY MAIL: By placing a true and correct copy of the above-described document(s) in envelope(s), addressed as set forth above, with first class postage pre-paid for delivery to the above-named persons at the above-listed addresses and depositing such envelopes in a US mail collection box.

BY OVER NIGHT DELIVERY, VIA FED-EX: I gave the document(s) to our overnight courier service for delivery to the offices of the addressee, addressed as set forth above.

BY PERSONAL SERVICE, VIA FIRST LEGAL ATTORNEY SERVICE: I gave said documents to the firm's regular attorney service with specific instructions to be personally delivered by hand to the offices of the addressee, addressed as set forth above.

BY PERSONAL SERVICE (*Ex Parte*): I personally delivered by hand to the attorney in attendance on behalf of the above-named counsel at the hearing of _____, in Department ___ of the _____ Courthouse, _____, California.

BY ELECTRONIC MAIL: I transmitted said document(s) to the person(s) shown above by electronic mail to the email address shown above.

BY FACSIMILE: I faxed said document(s) to the addressee, at the specified fax numbers shown above.

COURTESY COPY BY ELECTRONIC MAIL: I transmitted courtesy copies of said document(s) to the person(s) shown above by electronic mail to the email address shown above.

(State) I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

(Federal) I declare that I am employed in the office of a member of the bar of this court at whose direction the service was made.

Executed on November 23, 2022, at Los Angeles, California.



Mark D. Passin

Reitler Kailas & Rosenblatt LLC
885 Third Avenue, 20th Floor
New York, New York 10022
Main: 212-209-3050
Fax: 212-371-5500
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CSReeder, PC
11766 Wilshire Blvd., Suite 1470
Los Angeles, CA 90025
Telephone: (310) 861-2470
Facsimile: (310) 861-2476
Email: mark@csrlawyers.com
(Admission pending *pro hac vice* application)
Attorneys for Plaintiff Lynne Freeman

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

----- x

LYNNE FREEMAN, an individual,

Case No. 1:22-cv-02435-LIS

Plaintiff,

-against-

TRACY DEEBS-ELKENANEY P/K/A TRACY WOLFF,
an individual, EMILY SYLVAN KIM, an individual,
PROSPECT AGENCY, LLC, a New Jersey limited
liability company, ENTANGLED PUBLISHING, LLC, a
Delaware limited liability company, HOLTZBRINCK
PUBLISHERS, LLC, D/B/A MACMILLAN, a New
York limited liability company, UNIVERSAL CITY
STUDIOS, LLC, a Delaware limited liability company,
CRAZY MAPLE STUDIO, INC, a California corporation

Defendants.

----- x

Propounding Party: Lynne Freeman

Responding Party: EMILY SYLVAN KIM

Set: Four

**PLAINTIFF LYNNE
FREEMAN'S
INTERROGATORIES TO
DEFENDANT EMILY
SYLVAN KIM, SET FOUR**

FAC FILED: May 23, 2022

Pursuant to Federal Rule of Civil Procedure Rule 33, Plaintiff Lynne Freeman (“Freeman” or “Plaintiff”) requests that Defendant Emily Sylvan Kim, answer the following interrogatories under oath and serve them upon Plaintiff within 30 days.

DEFINITIONS

As used in these requests, the following terms are to be interpreted in accordance with these definitions:

- a. “YOU” and “YOUR” shall mean defendant Emily Sylvan Kim.
- b. “ACTION” shall mean this action filed in the United States District Court for the Southern District of New York (Case No. 1:22-cv-02435-AT) entitled Lynne Freeman v. Tracy Deeks-Elkenaney p/k/a Tracy Wolff et. al.
- c. “CRAVE BOOK SERIES” shall mean the books entitled Crave, Crush, Covet, Court, Charm and Cherish.
- d. “BMR” shall mean any and all versions of the manuscript that FREEMAN alleges in the First Amended Complaint that she wrote, including, but not limited to, the versions entitled *Blue Moon Rising* and *Masqued*, and she alleges was infringed by the books in the CRAVE SERIES entitled *Crave, Crush, Covet* and *Court*.
- e. “KLARIS FIRM DEFENDANTS’ ANSWER” shall mean the Answer of Prospect Agency, LLC and Emily Sylvan Kim to First Amended Complaint dated June 27, 2022 filed in this action.

INTERROGATORIES

INTERROGATORY NO. 9:

Identify by name, company, address or e-mail address, as applicable, and date sent, all individuals or entities to whom YOU sent a copy of any version of BMR.

INTERROGATORY NO. 10:

Describe in detail each and every fact that supports or negates each denial of the allegations in Lynne Freeman's First Amended Complaint filed in this ACTION set forth in the KLARIS FIRM DEFENDANTS' ANSWER.

INTERROGATORY NO. 11:

Describe in detail each and every fact that supports or negates the First Affirmative Defense alleged in the KLARIS FIRM DEFENDANTS' ANSWER.

INTERROGATORY NO. 12:

Describe in detail each and every fact that supports or negates the Second Affirmative Defense alleged in the KLARIS FIRM DEFENDANTS' ANSWER.

INTERROGATORY NO. 13:

Describe in detail each and every fact that supports or negates the Sixth Affirmative Defense alleged in the KLARIS FIRM DEFENDANTS' ANSWER.

INTERROGATORY NO. 14:

Describe in detail each and every fact that supports or negates the Eighth Affirmative Defense alleged in the KLARIS FIRM DEFENDANTS' ANSWER.

INTERROGATORY NO. 15:

Describe in detail each and every fact that supports or negates the Tenth Affirmative Defense alleged in the KLARIS FIRM DEFENDANTS' ANSWER.

INTERROGATORY NO. 16:

Describe in detail each and every fact that supports or negates the Eleventh Affirmative Defense alleged in the KLARIS FIRM DEFENDANTS' ANSWER.

INTERROGATORY NO. 17:

Describe in detail each and every fact that supports or negates the Thirteenth Affirmative Defense alleged in the KLARIS FIRM DEFENDANTS' ANSWER.

INTERROGATORY NO. 18:

Describe in detail each and every fact that supports or negates the Fifteenth Affirmative Defense alleged in the KLARIS FIRM DEFENDANTS' ANSWER.

INTERROGATORY NO. 19:

Describe in detail each and every fact that supports or negates the Sixteenth Affirmative Defense alleged in the KLARIS FIRM DEFENDANTS' ANSWER.

INTERROGATORY NO. 20:

Describe in detail each and every fact that supports or negates the Seventeenth Affirmative Defense alleged in the KLARIS FIRM DEFENDANTS' ANSWER.

INTERROGATORY NO. 21:

Describe in detail each and every fact that supports or negates the Nineteenth Affirmative Defense alleged in the KLARIS FIRM DEFENDANTS' ANSWER.

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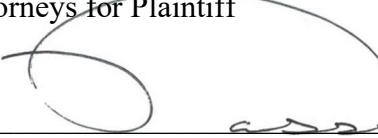
/ / /

/ / /

Dated: November 23, 2022

CSReeder, P.C.

Attorneys for Plaintiff

By: 

Mark D. Passin
11766 Wilshire Blvd., Suite 1470
Los Angeles, CA 90025
Telephone: (310) 861-2470
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Reitler Kailas & Rosenblatt LLC
Paul LiCalsi
885 Third Avenue, 20th Floor
New York, New York 10022
Main: 212-209-3050
Email: plicalsi@reiterlaw.com

PROOF OF SERVICE

STATE OF CALIFORNIA)
COUNTY OF LOS ANGELES) ss:

I am employed in the County of Los Angeles, State of California. I am over the age of 18 and not a party to the within action; my business address is: 11766 Wilshire Blvd., Suite 1470, Los Angeles, CA 90025.

On November 23, 2022 I served the foregoing document described as **PLAINTIFF LYNNE FREEMAN'S INTERROGATORIES TO DEFENDANT EMILY SYLVAN KIM, SET FOUR** on the parties in this action listed below as follows:

<p>Nancy Wolff <u>nwolff@cdas.com</u> CeCe Cole <u>ccole@cdas.com</u> Cowan, DeBaets, Abrahams & Sheppard LLP</p> <p>Dwayne Goetzel <u>dgoetzel@intprop.com</u> Kowert, Hood, Munyon, Rankin & Goetzel</p>	<p><i>Attorneys for Defendants,</i> TRACY DEEBS-ELKENANEY P/K/A TRACY WOLFF, ENTANGLED PUBLISHING, LLC, HOLTZBRINCK PUBLISHERS, LLC, D/B/A/ MACMILLAN, UNIVERSAL CITY STUDIOS, LLC</p>
<p>Lacy Herman Koonce, III <u>lance.koonce@klarislaw.com</u> Zachary M. Press <u>zpress@mkslex.com</u> Klaris Law</p>	<p><i>Attorneys for Defendants,</i> EMILY SYLVAN KIM, PROSPECT AGENCY, LLC</p>

BY MAIL: By placing a true and correct copy of the above-described document(s) in envelope(s), addressed as set forth above, with first class postage pre-paid for delivery to the above-named persons at the above-listed addresses and depositing such envelopes in a US mail collection box.

BY OVER NIGHT DELIVERY, VIA FED-EX: I gave the document(s) to our overnight courier service for delivery to the offices of the addressee, addressed as set forth above.

BY PERSONAL SERVICE, VIA FIRST LEGAL ATTORNEY SERVICE: I gave said documents to the firm's regular attorney service with specific instructions to be personally delivered by hand to the offices of the addressee, addressed as set forth above.

BY PERSONAL SERVICE (*Ex Parte*): I personally delivered by hand to the attorney in attendance on behalf of the above-named counsel at the hearing of _____, in Department ___ of the _____ Courthouse, _____, California.

BY ELECTRONIC MAIL: I transmitted said document(s) to the person(s) shown above by electronic mail to the email address shown above.

BY FACSIMILE: I faxed said document(s) to the addressee, at the specified fax numbers shown above.

COURTESY COPY BY ELECTRONIC MAIL: I transmitted courtesy copies of said document(s) to the person(s) shown above by electronic mail to the email address shown above.

(State) I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

(Federal) I declare that I am employed in the office of a member of the bar of this court at whose direction the service was made.

Executed on November 23, 2022, at Los Angeles, California.



Mark D. Passin

Reitler Kailas & Rosenblatt LLC
885 Third Avenue, 20th Floor
New York, New York 10022
Main: 212-209-3050
Fax: 212-371-5500
Email: plicalsi@reiterlaw.com

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Email: mark@csrlawyers.com
(Admission pending *pro hac vice* application)
Attorneys for Plaintiff Lynne Freeman

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

----- x

LYNNE FREEMAN, an individual,

Case No. 1:22-cv-02435-LIS

Plaintiff,

-against-

TRACY DEEBS-ELKENANEY P/K/A TRACY WOLFF,
an individual, EMILY SYLVAN KIM, an individual,
PROSPECT AGENCY, LLC, a New Jersey limited
liability company, ENTANGLED PUBLISHING, LLC, a
Delaware limited liability company, HOLTZBRINCK
PUBLISHERS, LLC, D/B/A MACMILLAN, a New
York limited liability company, UNIVERSAL CITY
STUDIOS, LLC, a Delaware limited liability company,
CRAZY MAPLE STUDIO, INC, a California corporation

Defendants.

----- x

Propounding Party: Lynne Freeman

Responding Party: Tracy Deeks-Elkenaney p/k/a Tracy Wolff

Set: FOUR

**PLAINTIFF LYNNE
FREEMAN'S
INTERROGATORIES TO
DEFENDANT TRACY
DEEBS-ELKENANEY
P/K/A TRACY WOLFF,
SET FOUR**

FAC FILED: May 23, 2022

Pursuant to Federal Rule of Civil Procedure Rule 33, Plaintiff Lynne Freeman (“Freeman” or “Plaintiff”) requests that Defendant Tracy Deebs-Elkaney p/k/a Tracy Wolff, answer the following interrogatories under oath and serve them upon Plaintiff within 30 days.

DEFINITIONS

As used in these requests, the following terms are to be interpreted in accordance with these definitions:

- a. “YOU” and “YOUR” shall mean defendant Tracy Deebs-Elkenaney p/k/a Tracy Wolff.
- b. “ACTION” shall mean this action filed in the United States District Court for the Southern District of New York (Case No. 1:22-cv-02435-AT) entitled Lynne Freeman v. Tracy Deebs-Elkenaney p/k/a Tracy Wolff et. al.
- c. “CRAVE BOOK SERIES” shall mean the books entitled Crave, Crush, Covet, Court, Charm and Cherish.
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- e. “COWAN FIRM DEFENDANTS’ ANSWER” shall mean the Answer and Affirmative Defenses of the of Tracy Deebs-Elkananey p/k/a Tracy Wolff, Entangled Publishing, LLC, Holtzbrink Publishers, LLC, d/b/a Macmillan and Universal City Studios, LLC dated June 27, 2022 filed in this ACTION.

INTERROGATORIES

INTERROGATORY NO. 10:

Identify by name, company, address or e-mail address, as applicable, and date sent, all individuals or entities to whom YOU sent a copy of any version of BMR.

INTERROGATORY NO. 11:

Describe in detail each and every fact that supports or negates the Thirteenth Affirmative Defense alleged in the COWAN FIRM DEFENDANTS' ANSWER.

INTERROGATORY NO. 12:

Describe in detail each and every fact that supports or negates each denial of the allegations in Lynne Freeman's First Amended Complaint filed in this ACTION set forth in the COWAN FIRM DEFENDANTS' ANSWER.

INTERROGATORY NO. 13:

Describe in detail each and every fact that supports or negates the Twenty-Fourth Affirmative Defense alleged in the COWAN FIRM DEFENDANTS' ANSWER.

INTERROGATORY NO. 14:

Describe in detail each and every fact that supports or negates the Second Affirmative Defense alleged in the COWAN FIRM DEFENDANTS' ANSWER.

INTERROGATORY NO. 15:

Describe in detail each and every fact that supports or negates the Third Affirmative Defense alleged in the COWAN FIRM DEFENDANTS' ANSWER.

INTERROGATORY NO. 16:

Describe in detail each and every fact that supports or negates the Fourth Affirmative Defense alleged in the COWAN FIRM DEFENDANTS' ANSWER.

INTERROGATORY NO. 17:

Describe in detail each and every fact that supports or negates the Fifth Affirmative Defense alleged in the COWAN FIRM DEFENDANTS' ANSWER.

INTERROGATORY NO. 18:

Describe in detail each and every fact that supports or negates the Seventh Affirmative Defense alleged in the COWAN FIRM DEFENDANTS' ANSWER.

INTERROGATORY NO. 19:

Describe in detail each and every fact that supports or negates the Eighth Affirmative Defense alleged in the COWAN FIRM DEFENDANTS' ANSWER.

INTERROGATORY NO. 20:

Describe in detail each and every fact that supports or negates the Tenth Affirmative Defense alleged in the COWAN FIRM DEFENDANTS' ANSWER.

INTERROGATORY NO. 21:

Describe in detail each and every fact that supports or negates the Seventeenth Affirmative Defense alleged in the COWAN FIRM DEFENDANTS' ANSWER.

INTERROGATORY NO. 22:

Describe in detail each and every fact that supports or negates the Twenty-Third Affirmative Defense alleged in the COWAN FIRM DEFENDANTS' ANSWER.

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Dated: November 23, 2022

CSReeder, P.C.
Attorneys for Plaintiff

By: 

Mark D. Passin
11766 Wilshire Blvd., Suite 1470
Los Angeles, CA 90025
Telephone: (310) 861-2470
Email: mark@csrlawyers.com

Reitler Kailas & Rosenblatt LLC
Paul LiCalsi
885 Third Avenue, 20th Floor
New York, New York 10022
Main: 212-209-3050
Email: plicalsi@reiterlaw.com

PROOF OF SERVICE

**STATE OF CALIFORNIA)
COUNTY OF LOS ANGELES) ss:**

I am employed in the County of Los Angeles, State of California. I am over the age of 18 and not a party to the within action; my business address is: 11766 Wilshire Blvd., Suite 1470, Los Angeles, CA 90025.

On November 23, 2022 I served the foregoing document described as **PLAINTIFF LYNNE FREEMAN'S INTERROGATORIES TO TRACY DEEBS-ELKENANEY P/K/A TRACY WOLFF, SET FOUR** on the parties in this action listed below as follows:

Nancy Wolff nwolff@cdas.com CeCe Cole ccole@cdas.com Cowan, DeBaets, Abrahams & Sheppard LLP Dwayne Goetzel dgoetzel@intprop.com Kowert, Hood, Munyon, Rankin & Goetzel	<i>Attorneys for Defendants,</i> TRACY DEEBS-ELKENANEY P/K/A TRACY WOLFF, ENTANGLED PUBLISHING, LLC, HOLTZBRINCK PUBLISHERS, LLC, D/B/A/ MACMILLAN, UNIVERSAL CITY STUDIOS, LLC
Lacy Herman Koonce, III lance.koonce@klarislaw.com Zachary M. Press zpress@mkslex.com Klaris Law	<i>Attorneys for Defendants,</i> EMILY SYLVAN KIM, PROSPECT AGENCY, LLC

BY MAIL: By placing a true and correct copy of the above-described document(s) in envelope(s), addressed as set forth above, with first class postage pre-paid for delivery to the above-named persons at the above-listed addresses and depositing such envelopes in a US mail collection box.

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BY PERSONAL SERVICE, VIA FIRST LEGAL ATTORNEY SERVICE: I gave said documents to the firm's regular attorney service with specific instructions to be personally delivered by hand to the offices of the addressee, addressed as set forth above.

BY PERSONAL SERVICE (*Ex Parte*): I personally delivered by hand to the attorney in attendance on behalf of the above-named counsel at the hearing of _____, in Department ___ of the _____ Courthouse, _____, California.

BY ELECTRONIC MAIL: I transmitted said document(s) to the person(s) shown above by electronic mail to the email address shown above.

BY FACSIMILE: I faxed said document(s) to the addressee, at the specified fax numbers shown above.

COURTESY COPY BY ELECTRONIC MAIL: I transmitted courtesy copies of said document(s) to the person(s) shown above by electronic mail to the email address shown above.

(State) I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

(Federal) I declare that I am employed in the office of a member of the bar of this court at whose direction the service was made.

Executed on November 23, 2022, at Los Angeles, California.



Mark D. Passin